

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$37,000.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:20-MC-00314-TLN-DB

**STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE**

17 It is hereby stipulated by and between the United States of America and potential claimant Kera
18 Barber (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 25, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
21 \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 24, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was December 24, 2020.

4. By Stipulation and Order filed December 17, 2020, the parties stipulated to extend to February 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. By Stipulation and Order filed February 12, 2021, the parties stipulated to extend to March 24, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. By Stipulation and Order filed March 23, 2021, the parties stipulated to extend to May 24, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

7. By Stipulation and Order filed May 20, 2021, the parties stipulated to extend to June 23, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

8. By Stipulation and Order filed June 22, 2021, the parties stipulated to extend to August 23, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

9. By Stipulation and Order filed August 19, 2021, the parties stipulated to extend to October 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

10. By Stipulation and Order filed October 21, 2021, the parties stipulated to extend to November 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture

1 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
2 to forfeiture.

3 11. By Stipulation and Order filed November 19, 2021, the parties stipulated to extend to
4 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
6 to forfeiture.

7 12. By Stipulation and Order filed December 21, 2021, the parties stipulated to extend to
8 January 21, 2022, the time in which the United States is required to file a civil complaint for forfeiture
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
10 to forfeiture.

11 13. By Stipulation and Order filed January 20, 2022, the parties stipulated to extend to February
12 18, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
14 forfeiture.

15 14. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend March
16 21, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
18 forfeiture.

19 15. Accordingly, the parties agree that the deadline by which the United States shall be required
20 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
21 the defendant currency is subject to forfeiture shall be **EXTENDED to March 21, 2022.**

22 Dated: 02/18/22

PHILLIP A. TALBERT
United States Attorney

24 By: /s/ Kevin C. Khasigian
25 KEVIN C. KHASIGIAN
Assistant United States Attorney

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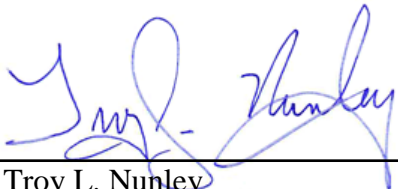
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1 Dated: 02/17/22

/s/ Jacek Lentz
JACEK LENTZ
Attorney for potential claimant
Kera Barber
(Signature authorized by email)

5 **IT IS SO ORDERED.**

6 Dated: February 18, 2022


Troy L. Nunley
United States District Judge